



Fiscal Year Enforcement Report 1991

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INTRODUCTION

The mission of the Department of Ecology is to protect, preserve and enhance Washington's environment and promote the wise management of our air, land, and water for the benefit of current and future generations.

One of the ways to accomplish this goal is to assure that both the private and public sectors are in compliance with environmental laws. The enforcement policy of Ecology stresses the importance of allowing the regulated community an opportunity to voluntarily comply with environmental laws. Ecology strongly supports, and has dedicated considerable resources to environmental education. Nevertheless, the ultimate responsibility of complying with environmental statutes and regulations lies with those individuals and facilities engaging in regulated activity. Therefore, enforcement by Ecology is pursued whenever voluntary compliance has not been achieved.

This report covers the time period of July 1990 through June 1991. The enforcement actions discussed in this report are actions taken by the Department of Ecology. Local air authorities, county health departments and other governmental bodies also have authority to enforce environmental laws; however, this report does not cover their activity.

DEPARTMENT OF ECOLOGY ENFORCEMENT TOOLS

A goal of Ecology is to have the entire regulated community achieve voluntary compliance, thus eliminating the need for enforcement.

Voluntary compliance with environmental regulations can usually be achieved by Ecology staff making site visits, phone calls, and sending letters. However, when voluntary actions fail to gain compliance, the agency then turns to formal enforcement in an attempt to change the violating party's behavior. The Department of Ecology has several formal enforcement actions to choose from and these actions vary according to severity of the violation and statutory authority. Listed below are the most frequently used formal enforcement tools.

NOTICE OF VIOLATION: A Notice of Violation (NOV) is an action authorized by law which provides formal notice that a specific violation has occurred or is about to occur. An NOV also requires a report from the violator (typically within 30 days) on the circumstances surrounding the violation and what steps are being taken to correct or prevent the violation.

ORDERS:

Administrative Order: An administrative order is a unilateral enforcement action taken by the agency which directs the violator to take specified actions, within a specified time, to achieve compliance. Failing to abide by an administrative order can result in civil penalties being issued.

Consent Order, Response Order by Consent, Compliance Order: These are all terms used to describe the same basic document. It is a negotiated agreement between the agency and regulated party, entered into in lieu of or to replace an administrative order directing the party to take certain action. These actions are essentially contracts, enforceable in court.

Consent Decree: Consent decrees are the primary enforcement tool used by Ecology's Toxics Clean-up Program. The consent decree is similar to the consent order in that it is a negotiated agreement between the agency and regulated party; however, the consent decree is filed with a court, signed by a judge, and is enforceable as an order of the court. Therefore, failure to comply with a consent decree can result in a finding of contempt of court and the violating party can be liable for any sanctions the court deems appropriate, including jail.

CIVIL PENALTY: A civil penalty may be assessed against any violator, whether public or private, up to a maximum level, as provided by law. (Some laws also prescribe minimum penalty amounts.)

INJUNCTIVE RELIEF: Injunctions are court orders prohibiting or directing a party to undertake certain actions. These will generally be used only after the violator has refused to take required compliance measures or the violation is causing an immediate threat to human health.

CRIMINAL SANCTIONS: Criminal sanctions are the most severe enforcement option which Ecology is allowed to pursue. The threat of heavy fines and imprisonment can be an effective deterrent to gross violations of environmental laws. Criminal activity in the environmental arena is usually limited to violations which were done knowingly and intentionally. Not all of Ecology programs have equal statutory authority to issue formal enforcement actions. Below is a brief list of the authorities of the different programs.

***ENFORCEMENT
OPTIONS FOR
ECOLOGY'S
PROGRAMS***

AIR - NOVs, Orders, Penalties up to \$10,000 per day per violation, Injunctive Relief and Criminal Sanctions.

WATER RESOURCES - Orders, Penalties up to \$100 per day per violation, Injunctive Relief and Criminal Sanctions.

WATER QUALITY - NOVs, Orders, Penalties up to \$10,000 per day per violation, Penalties up to \$20,000 per day per violation for negligent discharges of oil and penalties up to \$100,000 per day per violation for intentional discharges of oil; Injunctive Relief and Criminal Sanctions.

SOLID AND HAZARDOUS WASTE - Orders, Penalties up to \$10,000 per day per violation, Injunctive Relief and Criminal Sanctions.

TOXICS CLEAN-UP - The Clean-up Program works through the state courts to carry out investigations and cleanups of hazardous substance releases. Through the courts they can issue orders, penalties up to \$25,000 per day per violation, obtaining cost recovery up to three times the cost incurred to the state, Injunctive Relief and Criminal Sanctions.

SHORELANDS - NOVs, Orders, Penalties up to \$1,000 per day per violation, Injunctive Relief and Criminal Sanctions.

JULY 1990 - JUNE 1991 ENFORCEMENT ACTIONS

During the 1991 fiscal year (July 1990 to June 1991), the Department of Ecology issued 404 formal enforcement actions. A formal enforcement action consists of NOVs, orders (all types), and penalties. As usual, the Water Quality Program issued the most actions with 137, they were followed by Central Programs with 91, Shorelands with 45, the Air Quality Program had 42, Water Resources took 37 actions, Solid and Hazardous Waste issued 38, and the Toxics Cleanup Program completed 20. The Solid and Hazardous Waste Program assessed penalties with a total value of \$1,232,500. However, \$903,000 of this total was assessed in one action to Lilyblad Petroleum of Tacoma. See the notable actions

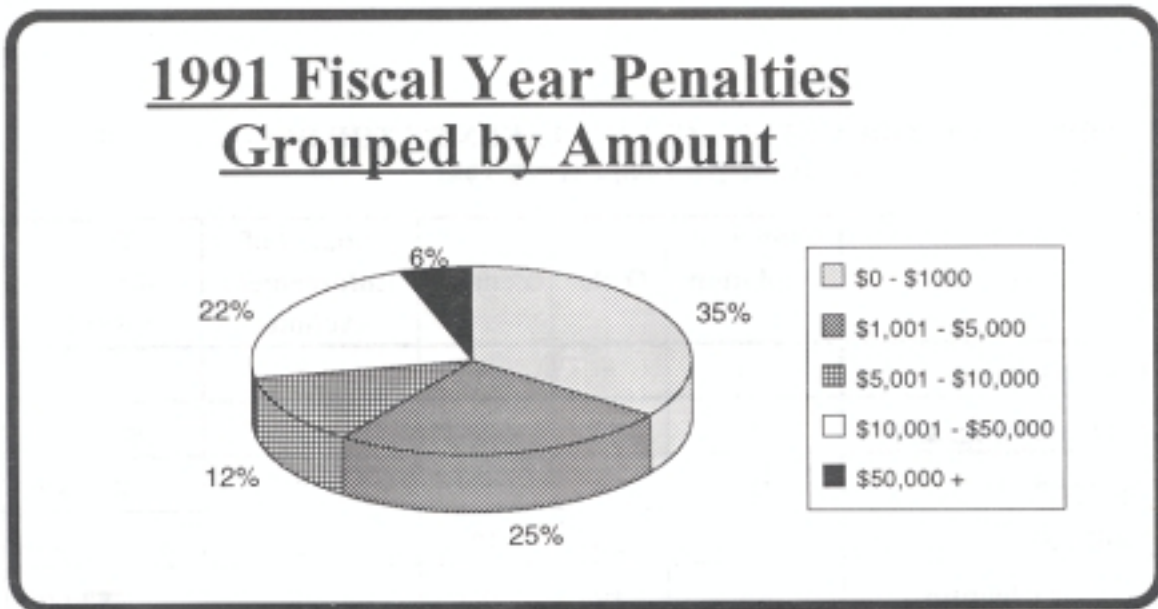
FORMAL ENFORCEMENT ACTIONS TAKEN BY THE DEPARTMENT OF ECOLOGY DURING JULY 1990 - JUNE 1991

Program	Notice of Violation	Order	Penalty	Total # of Enforcement Actions	Total Amount Assessed	Median Penalty Amount
Air Quality	29	2	11	42	\$10,900	\$500
Central Programs	5	19	67	91	\$722,000	\$4,500
Shorelands	NA	24	21	45	\$380,880	\$30,000
Solid & Haz. Waste	NA	20	12	32	\$1,232,500*	\$17,500
Toxics Cleanup	NA	19	1	20	\$3,000	\$3,000
Water Quality	72	34	31	137	\$229,750	\$1,500
Water Resources	NA	23	14	37	\$13,700	\$150
TOTALS	106	141	157	404	\$2,592,730	\$3,000

**Includes a \$903,000 penalty against Lilyblad Petroleum.*

section of this document for a discussion of this and other significant enforcement actions. The median penalty amount for the 1991 fiscal year is an even \$3,000. This is up from the median amount of the previous fiscal year of \$2,700. The Shorelands Programs median figure of \$30,000 is somewhat misleading because the program issued 11 \$30,000 penalties, all of which were related to the same issue. The Shorelands median penalty is normally much lower. The \$17,500 median penalty for the Solid and Hazardous Waste Program is reflective of the significant dangerous waste violations and spills which have been discovered recently.

The chart below shows penalties issued during the 1991 fiscal year grouped according to the penalty size. As can be seen, 60% of the penalties which Ecology issues are equal to or less than \$5,000.



NOTABLE ENFORCEMENT ACTIONS

Following is a short discussion of some of the more notable enforcement actions completed during the 1991 fiscal year.

Ecology issues a \$903,000 penalty, the largest ever issued by the agency.

LILYBLAD PETROLEUM, INC. - Lilyblad Petroleum, a facility located in Tacoma; recycles, blends and markets petroleum products. Lilyblad was penalized \$903,000 for more than 40 different hazardous waste violations in November 1990. Violations included misrepresenting dangerous wastes as fuel oil, failing to report 2,600 tons of dangerous waste received from generators, releasing hazardous waste to the environment, illegally mixing waste with fuels to circumvent regulations and exposing the public to toxic chemicals. A comprehensive administrative order was also issued along with the penalty. Lilyblad has received several penalties and orders in the past. This penalty is the largest ever issued by the Department of Ecology. As of November 1991 the penalty was still in the appeal process.

COMET TRAILER MANUFACTURING CORP. - Comet Trailer was penalized \$94,000 for 15 different violations of the state's hazardous waste regulations. Comet Trailer operates a truck trailer manufacturing facility in Selah (Yakima County) and was inspected by Ecology staff at different times in September, October, and December 1990 and again in March 1991. Through these inspections, Ecology inspectors documented violations which included: operating a dangerous waste facility without a permit; exceeding the 90 day storage limit; failure to properly label hazardous waste containers; and failure to develop required inspection, training and safety plans. As of November 1991 the penalty was still in the appeal process.

ITT RAYONIER, INC. - ITT Rayonier, Hoquiam, was penalized \$80,000 for exceeding eight daily limits for Total Suspended Solids, Biochemical Oxygen Demand and pH in December 1990. These excursions were caused by the overflow of a sodium hydroxide (caustic) storage tank which spilled into ITT's wastewater sewer system. This overflow lasted between 15 to 30 minutes. ITT had no overflow alarms on the caustic storage tanks, no pH monitor or alarm system for the wastewater sewer system near the storage tanks and they did not have someone watching for problems. This penalty has been appealed to the PCHB.

The Air Program issues their largest penalty to date, a \$55,200 action against Reynolds Metal of Longview.

REYNOLDS METAL CO. - Reynolds Metal Longview Reduction Plant was penalized \$55,200 for exceeding the state's particulate limit for aluminum emissions for the months of July, August and September 1990. The \$55,200 fine was based on a penalty of \$600 per day for ninety-two (92) days. Reynolds paid this penalty without appealing.

ROSS ELECTRIC OF WASHINGTON, INC. - Ross Electric, Chehalis, operates a hazardous waste incinerator. For nearly a month in August 1990, Ross operated its incinerator without a temperature recorder or any other combustion or emission monitoring devices as required by state regulation. Ross Electric also failed to follow proper start-up and shut-down procedures for a hazardous waste incinerator; conduct proper equipment inspections; and were in violation of several dangerous waste handling practices such as waste identification, record keeping, labeling, and storage. As a result of these violations, Ross was penalized \$90,000. This penalty is currently under appeal with the PCHB.

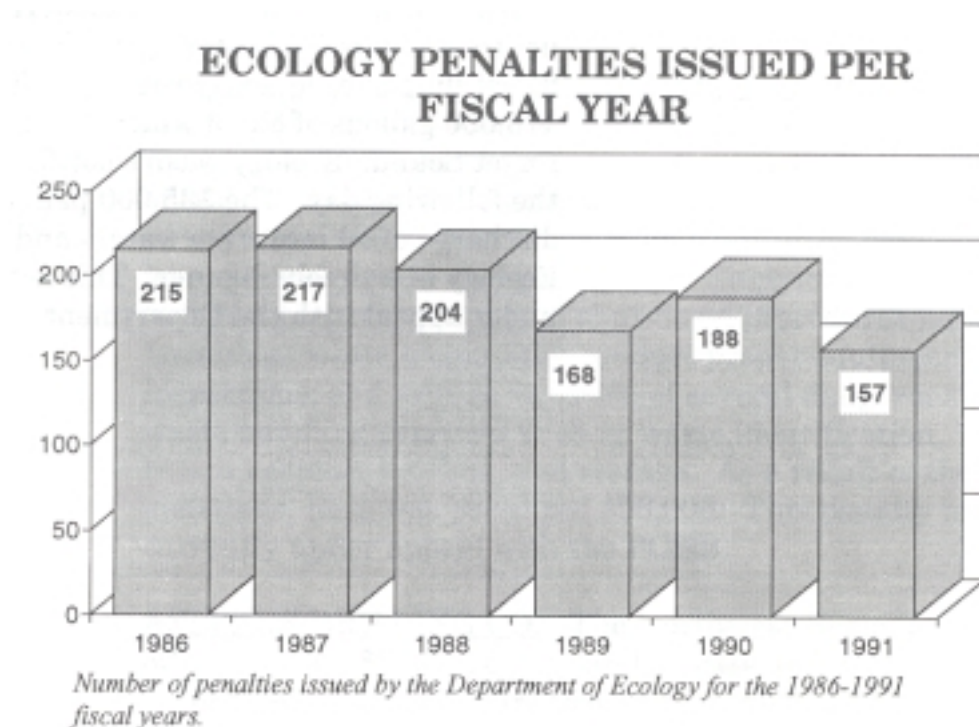
AXLESEN DRILLING CO. - The Northwest Regional office issued a \$6,300 penalty and a cease and desist order to Axlesen for failure to obey an Order of Compliance. This well driller has received four Notice of Violations, seven Administrative Orders and four Penalties in the last five years. This penalty is the largest ever issued by the Water Resources program. This penalty has been settled.

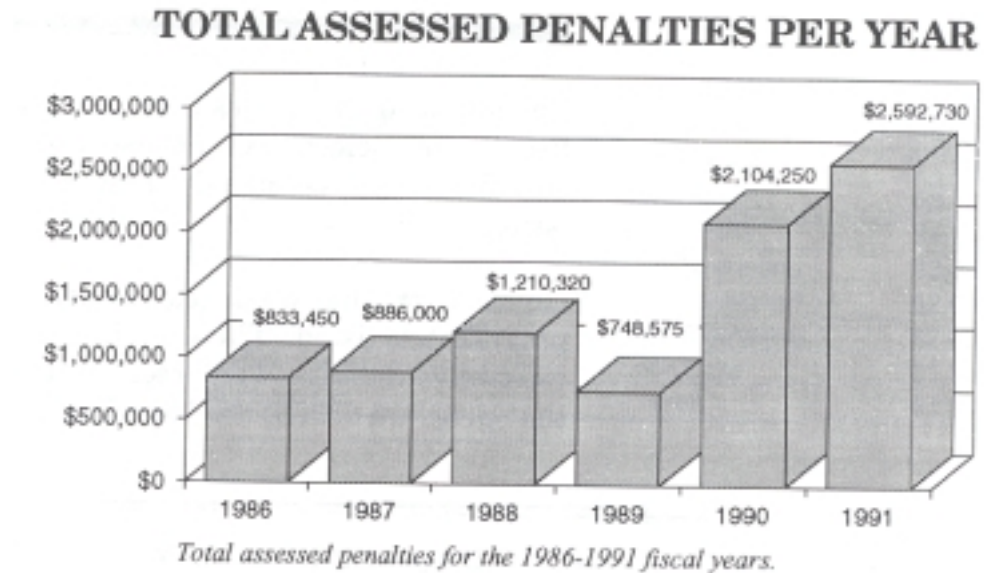
SKOKOMISH RIVER DIKE - In 1990, the Shorelands Program issued \$30,000 penalties to eleven (11) different parties for not complying with a 1988 administrative order. The order required these parties to remove an illegally constructed dike along the Skokomish River. The order was appealed and the Shorelines Hearings Board ruled that the dike was an illegal improvement, was improperly constructed and constituted a hazard to public health. Thereafter, Ecology issued an amended order in 1991 requiring the removal of the dike. However, all parties failed to accomplish this requirement and were penalized \$1,000 per day for thirty days. This dike failed during the winter floods of 1990. These enforcement actions are currently under appeal in superior court.

CHEVRON U.S.A., INC. - Chevron's Point Wells asphalt refinery facility in Richmond Beach was penalized \$35,000 for an oil spill which occurred on August 30, 1990. The cause of this spill was determined to be the over-filling of oil during the transferring of asphalt product from a vessel to a storage tank at the refinery. This over-filling subsequently ruptured the tank spilling 176,000 gallons of oil, of which 4,000 gallons entered Puget Sound. Ecology wasn't notified of this spill until the following day. The \$35,000 penalty was assessed for discharge of oil into state waters and failure to notify Ecology in a timely manner. This action is currently under appeal with the Department.

ENFORCEMENT TRENDS

The chart below shows the number of penalties issued in each of the past fiscal years by the Department of Ecology. As the chart clearly shows, the number of penalties issued by the department has decreased over this time period. The actual amount of this decrease was a 27% drop in the number of penalties issued by the department from 1986 to 1991. The total number of enforcement actions taken by the agency, including NOV's, orders and penalties has experienced a similar decline.





While the number of penalties issued by the agency has decreased, the total penalty amounts assessed per year has increased dramatically over this same time period. This can be seen in the above chart. Although the number of penalties issued declined by 27%, the total penalty amounts assessed increased over 200% for the same time period. As a measure of comparison, the average penalty issued in the 1987 fiscal year, which was Ecology's record year for the most number of penalties issued, was \$4,082. The average penalty issued during the 1991 fiscal year is \$10,763 without including the \$903,000 penalty issued to Lilybald Petroleum. Whether these trends are viewed as positive or negative for the agency is a matter of personal judgement; however, these trends do mirror similar ones experienced by the EPA over the past several years.

TOP VIOLATOR LISTS

The following two tables list the top violators for the 1991 fiscal year. Selections for these tables were based on the size of the assessed penalty and the number of actions issued.

On the following two pages, the top 12 violators for each program are listed. These tables were compiled using the top twelve individual enforcement actions issued from that program during the 1991 fiscal year.

*TOP 12 VIOLATORS
FOR THE 1991 FISCAL
YEAR, BASED ON
NUMBER OF
VIOLATIONS*

RANK	ORGANIZATION/FACILITY	LOCATION	NUMBER of ACTIONS
1	Columbia Aluminum Corp.	Goldendale	8
1	Allied Aquatics	Olympia	8
2	Longview Fibre, Inc.	Longview	7
2	Reynolds Metals Co.	Longview	7
2	Boise Cascade Corp.	Kettle Falls	7
3	Port Townsend Paper	Port Townsend	6
4	James River Corp.	Camas	6
5	Weyerhaeuser Corp.	Cosmopolis	4
5	Intalco Aluminum Corp.	Ferndale	4
5	Simpson Tacoma Kraft Co.	Tacoma	4
5	Texaco Refining and Marketing Inc	Anacortes	4
5	Lilyblad Petroleum, Inc.	Tacoma	4

RANK	ORGANIZATION/FACILITY	LOCATION	NUMBER of PENALTIES	AMOUNT ASSESSED
1	Lilyblad Petroleum, Inc.	Tacoma	2	\$982,000
2	Longview Fibre, Inc.	Longview	5	\$113,250
3	ITT Rayonier, Inc.	Hoquiam	2	\$100,000
4	Reynolds Metals Co.	Longview	5	\$95,700
5	Comet Trailer Mfg. Corp.	Selah	1	\$94,000
6	Ross Electric	Chehalis	1	\$90,000
7	US Oil & Refining Co.	Tacoma	1	\$65,000
8	Sol Pro, Inc.	Tacoma	1	\$57,500
9	Vancouver Extrusion	Vancouver	1	\$43,000
10	James River Corp.	Camas	5	\$42,000
11	Weyerhaeuser Corp.	Cosmopolis	4	\$40,400
12	Columbia Aluminum Corp.	Goldendale	3	\$34,700

*TOP 12 VIOLATORS FOR THE 1991 FISCAL YEAR, BASED ON TOTAL
AMOUNT ASSESSED.*

ENFORCEMENT REPORT, JULY 1990-JUNE 1991

TOP 12 PENALTIES ISSUED BY THE AIR QUALITY PROGRAM

RANK	ORGANIZATION/FACILITY	LOCATION	PENALTY AMOUNT
1	Reynolds Metals Co.	Longview	\$55,200
2	Longview Fibre Co.	Longview	\$39,900
3	Reynolds Metals Co.	Longview	\$18,000
4	Columbia Aluminum Corp.	Goldendale	\$17,200
5	Longview Fibre Co.	Longview	\$8,100
6	Boise Cascade Corp.	Kettle Falls	\$4,750
7	Port Townsend Paper Corp.	Port Townsend	\$3,000
8	Port Townsend Paper Corp.	Port Townsend	\$2,000
8	Port Townsend Paper Corp.	Port Townsend	\$2,000
9	Joan Blakemore	Loon Lake	\$1,200
9	Scott Paper Co.	Loon Lake	\$1,200

TOP 12 PENALTIES ISSUED BY THE WATER QUALITY PROGRAM

RANK	ORGANIZATION/FACILITY	LOCATION	PENALTY AMOUNT
1	ITT Rayonier, Inc.	Hoquiam	\$80,000
2	Lilyblad Petroleum, Inc.	Tacoma	\$79,000
3	Longview Fibre Co.	Longview	\$40,000
4	Chevron USA, Inc.	Seattle	\$35,000
5	James River Corp.	Camas	\$25,000
5	Longview Fibre Co.	Longview	\$25,000
6	ITT Rayonier, Inc.	Hoquiam	\$20,000
6	ITT Rayonier, Inc.	Port Angeles	\$20,000
6	Nordevin, Inc.	Puyallup	\$20,000
6	Weyerhaeuser Corp.	Cosmopolis	\$20,000
7	Reynolds Metals Co.	Longview	\$19,000
8	Allied Aquatics	Eatonville	\$18,000

TOP 12 PENALTIES ISSUED BY THE SOLID AND HAZARDOUS WASTE PROGRAM

RANK	ORGANIZATION/FACILITY	LOCATION	PENALTY AMOUNT
1	Lilyblad Petroleum, Inc.	Tacoma	\$903,000
2	Comet Trailer Mfg. Corp.	Selah	\$94,000
3	Ross Electric	Chehalis	\$90,000
4	US Oil & Refining Co.	Tacoma	\$65,000
5	Sol Pro, Inc.	Tacoma	\$57,500
6	Vancouver Extrusion Co., Inc.	Vancouver	\$43,000
7	Valley Refinishing	Sumner	\$25,000
8	Monarch Bullet Co.	Rochester	\$20,000
9	Western Fab & Finishing	Walla Walla	\$15,000
10	BP Oil Co.	Ferndale	\$14,000
11	Stemilt Growers, Inc.	Wenatchee	\$12,000
12	Arco Petroleum Products Co.	Ferndale	\$10,500

DEPARTMENT OF ECOLOGY

*TOP 14 PENALTIES
ISSUED BY THE
WATER RESOURCES
PROGRAM*

RANK	ORGANIZATION/FACILITY	LOCATION	PENALTY AMOUNT
1	Axelsen Drilling	King Co	\$6,300
2	Pearson Drilling, Inc.	King Co	\$5,000
3	Howe Drilling Co.	Snohomish Co	\$700
4	Mathews Well Drilling	Kitsap Co	\$300
4	Ponderosa Drilling	Yakima Co	\$300
5	Larry Burd Well Drilling	Walla Walla Co	\$200
5	Westwind Ranch	Grant Co	\$200
6	D and F Drilling	Grant Co	\$100
6	Larry Burd Well Drilling	Walla Walla Co	\$100
6	Mountain Well Drilling	Yakima Co	\$100
6	Myricks Well Drilling	Grant Co	\$100
6	Ponderosa Drilling	Yakima Co	\$100
6	Water Wells Drilling	Yakima Co	\$100
6	Westwind Ranch	Grant Co	\$100

*TOP 12 PENALTIES
ISSUED BY THE
SHORELANDS
PROGRAM*

RANK	ORGANIZATION/FACILITY	LOCATION	PENALTY AMOUNT
1	Arthur Johnson	Mason Co	\$30,000
1	Arvid Johnson	Mason Co	\$30,000
1	Kealy Ray	Mason Co	\$30,000
1	Mason Co Dept of Public Works	Mason Co	\$30,000
1	Larry Reid	Mason Co	\$30,000
1	Gerald Richert	Mason Co	\$30,000
1	Skokomish Farms, Inc.	Mason Co	\$30,000
1	John Spencer	Mason Co	\$30,000
1	George Valley	Mason Co	\$30,000
1	Mary Lou Waterman	Mason Co	\$30,000
1	Stephen Wilmus	Mason Co	\$30,000
2	Chelan Boat Rentals	Chelan	\$15,000

APPEALS OF ENFORCEMENT ACTIONS

Most enforcement actions taken by Ecology are appealable. However, appeal procedures differ for different enforcement actions. With the exception of the Toxics Cleanup Program, any penalty issued by the Department is appealable to both Ecology and/or the Pollution Control Hearings Board (PCHB). The Shorelines Hearings Board (SHB) hears appeals of shoreline development issues. Orders, on the other hand, can only be appealed to the PCHB and NOVs cannot be appealed.

Ecology enforcement actions taken by the Toxics Cleanup Program under the Model Toxics Control Act differ substantially from other Ecology actions. Under this act, all enforcement orders are filed with a court and are not appealable. The penalties issued from this program are issued by the court and can only be appealed to the court.

All decisions of the PCHB and SHB are appealable to a higher court. Either Ecology or the violating party may appeal a board's decision. However, appeals to a court can only be made after all administrative options (i.e. appeals to Ecology and an Environmental Hearings Board) have been exhausted.

POLLUTION CONTROL HEARINGS BOARD and SHORELINES HEARING BOARD

The Pollution Control Hearings Board (PCHB) was created in 1970 as part of the Environmental Hearings Office. The Board is composed of three members and was created to provide a faster and more efficient procedure to handle appeals from decisions made by Ecology. The Shorelines Hearings Board (SHB) was created in 1971 and is similar to the PCHB except that its jurisdiction is limited to matters arising under the Shorelines Management Act. The SHB has six members.

**FISCAL YEAR
APPEALS**

*Innovative
settlements
account for
nearly half of
all settlements.*

During the 1991 fiscal year, Department of Ecology staff responded to 64 appeals of formal enforcement actions; these are appeals to the agency asking for relief of a penalty. Of these 64, Ecology mitigated 14 of them for an overall penalty reduction of 8%. Working with attorneys from the Washington State Attorney General's Office, Ecology staff also negotiated 31 settlements of formal enforcement actions. Settlements of Ecology enforcement actions can occur any time after a penalty is appealed to the Pollution Control Hearings Board. Of the \$667,950 in penalties which started the settlement process, Ecology mitigated \$327,500 of this total for a 49% penalty reduction. However, nearly half of this reduction is in the form of innovative settlements. Innovative settlements require that actions benefiting the impacted resource be undertaken in lieu of the penalty. Also during the 1991 fiscal year, the Pollution Control Hearings Board completed final rulings on 5 enforcement cases which were not already settled or withdrawn.

Below is a discussion of some notable settlements and PCHB cases which were completed during the last fiscal year.

SETTLEMENTS:

PORT OF LONGVIEW – In October 1989 the Port of Longview was penalized \$132,000 for the repeated mishandling and spills of coal tar pitch. In September 1990, staff from the Attorney General's Office and Ecology negotiated a settlement with the Port which includes the following terms: the Port must pay \$30,000 to Ecology; the Port is credited \$50,000 to buy a state of the art sweeper (estimated cost of \$110,000); the Port is to donate \$17,000 to a Longview-Kelso drainage study; the Port is to complete a study for coal tar pitch loading; the Port is to sponsor an environmental education seminar (\$5,000 credit); and Ecology will defer \$30,000 for three years, pending no further violations.

GENERAL PLASTICS MANUFACTURING CO. –

General Plastics Manufacturing of Tacoma was penalized \$46,000 in December 1989 for several violations to the dangerous waste regulations, including failure to report spills. General Plastics submitted an application for relief to Ecology and the agency consequently reduced the penalty by \$3,000. General then appealed the penalty to the PCHB. Before being heard by the Board, Ecology and General reached the following settlement: General agreed to pay \$17,200 to Ecology and to pay the remaining \$25,800 to the Western Washington University's Western Foundation for the purpose of supporting the solar vehicle research and development project. Furthermore, General cannot claim the \$25,800 paid to the foundation as a charitable donation for the purpose of computing corporate business or income taxes.

Simpson agrees to donate \$9,000 to the Tacoma Haz-Mat Unit and \$23,500 to the Point Defiance Zoo and Aquarium.

SIMPSON TACOMA KRAFT CO. – Simpson Tacoma Kraft Co. of Tacoma was assessed three penalties totaling \$40,000 for violating the limits of their NPDES permit. Simpson appealed all three penalties to the Pollution Control Hearings Board; however, in the interest of saving time and money, Ecology and Simpson reached settlements on each penalty during the 1990-1991 fiscal year. The Department of Ecology and Simpson settled these penalties in the following manner. Ecology mitigated \$5,000 of the penalty, and Simpson must pay Ecology \$2,500. Simpson must donate \$9,000 to the Tacoma Fire Department's Hazardous Material Response Unit. The "Haz-Mat Unit" is then required to use these funds to purchase and maintain equipment necessary to implement its Hazardous Materials Response Plan. Simpson must also donate \$23,500 to the Point Defiance Zoo and Aquarium for the North Pacific Aquarium Interpretative Program. Simpson also agreed that sums paid to the Tacoma Fire Department and the Point Defiance Zoo and Aquarium will not be used as a charitable tax deduction.

PEARSON DRILLING INC. - In December 1990, Pearson Drilling was penalized \$5,000 for violating an order requiring the proper construction of three resource protection wells. After appealing to the PCHB, the following settlement was reached: \$500 shall be paid to Ecology, with the remaining \$4,500 waived pending no further violations for one year; and, the president of Pearson Drilling must retake the water well contractors and operators exam even though he already possesses a license. This exam will be given orally by Ecology staff.

PCHB CASES:

*PCHB upholds
entire amount of a
\$114,000 penalty.*

*Board states:
"Penalties should be
such that it is not to
the operator's
advantage to defer
expenses and
compliance until
caught."*

NORTHWEST PROCESSING, INC. vs. ECOLOGY - On June 7, 1991 a \$114,000 penalty issued to Northwest Processing was upheld in full by the PCHB. Northwest Processing (NWP) is an industrial facility located in Tacoma, which in part, recycles petroleum fuels and waste oils. The company was penalized for numerous violations to the states hazardous waste laws. The Notice of Penalty, issued on September 22, 1989, listed 19 separate violations in citing 43 different WACs. The PCHB ruled that 27 of these WACs were violated and that 15 of the original 19 violations were proven by Ecology. It is significant that although not all violations were proven, the entire penalty was still upheld. This is the largest penalty Ecology has ever argued before the Board. Because of the size of this penalty, the Board's decision will be reviewed very carefully and this case is likely to be used as precedence for future cases. Significant among the Board's rulings is that the \$114,000 penalty was upheld for violations which were mostly non-environmental damage actions. This shows that industry doesn't have to have large spills or releases to the environment in order for the Board to uphold substantial penalties. Also of importance, the Board showed that large penalties are warranted where noncompliance has allowed an unfair economic advantage or advantage to defer expenses and compliance until caught."

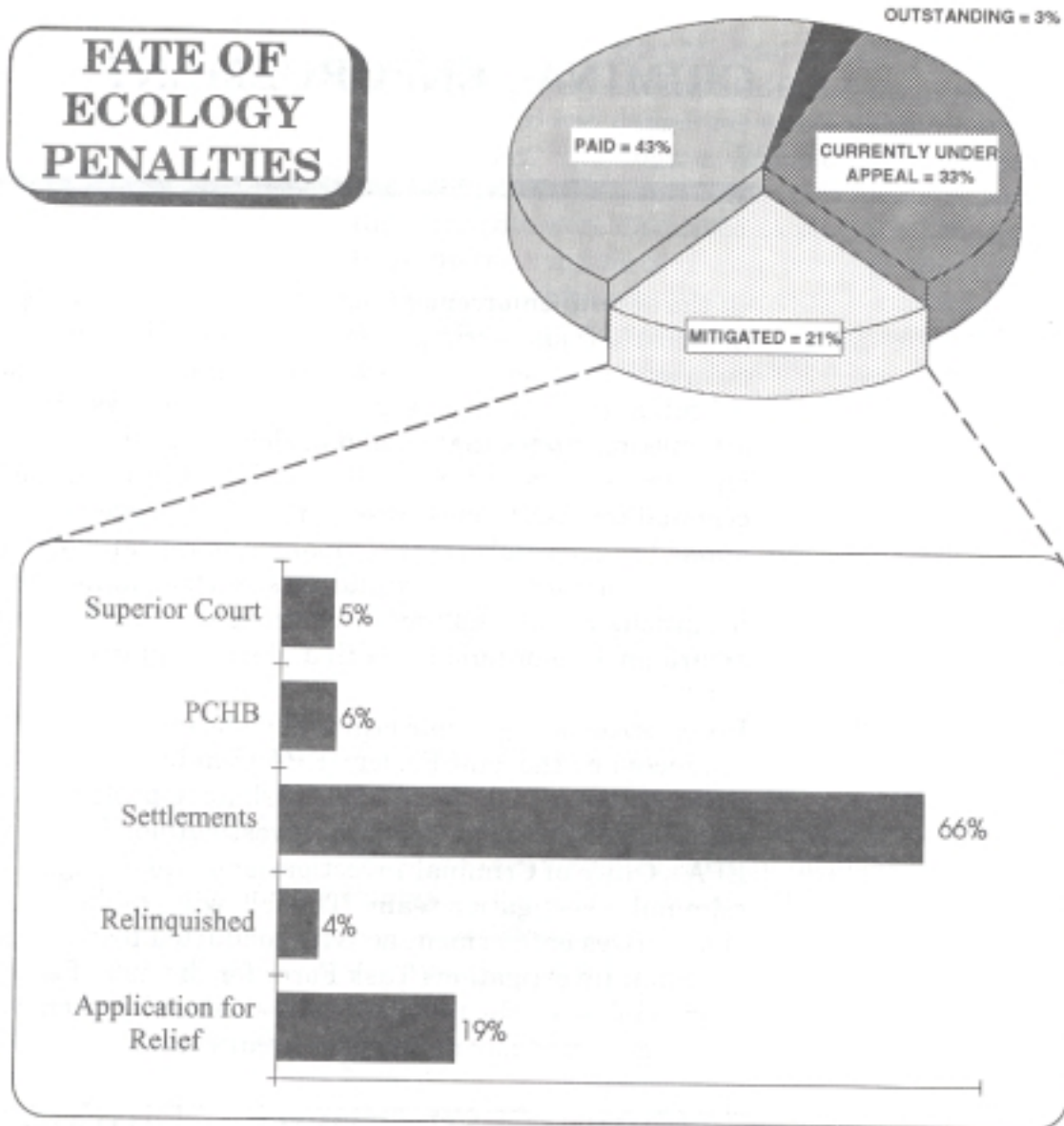
ALLIED AQUATICS vs. DOE - Allied Aquatics, a company which applies aquatics herbicides to lakes, was penalized \$3,000 for herbicide application without the required Department of Ecology water quality modification order. Allied Aquatics disputed this penalty on the grounds that the treated lake was entirely on private property and not subject to Ecology's regulations. The Board found in favor of Ecology and upheld the entire penalty. The Board relied on their earlier decision, CH20, Inc vs. DOE, where they liberally defined "waters of the state" under 90.48.020 RCW to include all groundwater, surface water and watercourses within the state.

BARNETT & ATLAS DRILLING vs. ECOLOGY - In April 1990, Ralph & Betty Barnett of Kittitas County and Atlas Drilling and Exploration, Inc., an Idaho corporation, were issued orders requiring that a recently drilled well on the Barnett's property be abandoned and closed. Ecology investigators found that because of improper construction, the well collapsed and ground water was migrating from one aquifer to another. The Barnetts and Atlas both appealed these orders to the PCHB. They contended that the Ecology orders were directed to the wrong persons and were unnecessary. They felt that the subcontractor, a James Carman, should be responsible for all costs of closing the well and complying with the orders. The board ruled in favor of Ecology and stated that the improper construction of wells is a serious matter and the orders were proper. The Board added that under the regulations, *the landowners are responsible for the proper construction of wells*; therefore, although the Barnetts had little control over the construction of the well, they are required to pay the costs of closing the well properly. This responsibility is also shared by Atlas.

WHAT HAPPENS TO THE PENALTIES ECOLOGY ASSESSES?

Of the \$7.8 million which Ecology has assessed from 1985-1990, 43% has been paid, 21% was mitigated, 33% is still under appeal and 4% is outstanding.

From 1985-1990, the Department of Ecology assessed a total of 7.8 million dollars in penalties. The pie-chart at right shows the fate of these assessments. As can be seen, 43% of this total has been paid, 4% is due but not paid, 33% is under appeal and 21% has been mitigated (reduced). The administrative appeals process can be lengthy and it can take many years before a final decision is rendered; therefore, as the cases currently under appeal complete this process, these totals could change substantially. The bar-chart, also to the right, shows the breakdown of the 21% reduction in penalties and who is making these reductions. The chart shows that the primary avenue by which Ecology's penalties are mitigated is by settlements with the violating parties. Settlements can be negotiated any time a penalty is appealed and they are completed jointly with the original inspector who recommended the penalty, attorneys from the Attorney General's Office and the violating party. Although 66% of the total amount mitigated is done through settlements, nearly half of this amount is in the form of innovative settlements. These settlements require that actions benefiting the impacted resource be undertaken in lieu of the penalty. Because of the positive environmental impact of innovative settlements, this settlement tool is rapidly gaining popularity in the Attorney General's Office and Ecology.



Explanation of chart terms:

Outstanding – Penalties which are due but are unpaid. Many of these are currently being pursued through a collection agency.

Application for Relief – A formal appeal to Ecology for mitigation of a penalty.

Relinquished – Penalties which are simply cancelled by the department. A common reason for relinquishing a penalty is that the party receiving the penalty is now bankrupt.

Settlements – Agreements between Ecology and the penalized party which are reached during litigation.

PCHB – The Pollution Control Hearings Board is the administrative body responsible for hearing appeals of departmental actions.

Superior Court – All PCHB decisions are appealable to higher courts.

CRIMINAL ENFORCEMENT

Of the several enforcement options available to Ecology, the most serious is criminal enforcement. The criminal enforcement program operates with the assumption that willful, knowing violators of environmental laws are committing crimes that should be dealt with in the same manner as any other criminal violation, that is, in the criminal courts. In most cases, criminal enforcement is applied to the recalcitrant company, the repeat violator, the most deliberate and willful acts (such as dumping hazardous waste) and those situations that have serious environmental or public health and safety impacts.

Investigations of possible criminal violations are conducted by the joint Ecology/EPA Criminal Investigations Task Force. This task force pools the resources of Ecology's Criminal Investigations Unit and EPA's Office of Criminal Investigations into a single criminal investigation team. The following table summarizes enforcement activity conducted by the Criminal Investigations Task Force for the 1991 fiscal year. Following the table are brief summaries of criminal cases completed during the past fiscal year.

CRIMINAL UNIT ACTIVITY DURING 1991 FISCAL YEAR	TOTALS
Complaints/Referrals Received	225
Cases Retained for Criminal Investigation	11
Cases Retained for Criminal Investigation (Number of Cases)	4
Criminal Charges Filed (Number of Defendants)	10
Criminal Convictions (Number of Defendants)	5
Total Penalties Collected	\$554,300

BERT WILLARD - Bert Michael Willard pled guilty on July 31, 1990 to one federal CERCLA count related to an asbestos, PCB and dangerous waste dumping incident in Maple Valley, Washington. Willard had been charged with other violations relating to this incident; however, these charges were dismissed as part of a plea agreement. Cleanup costs in this case were borne by the Boeing Corporation which was the one time historical possessor of these wastes. As part of his plea agreement, Willard pointed out several other dumping sites. On January 16, 1991, Willard was sentenced in federal court for the CERCLA violation. Judge Dwyer sentenced Willard to 6 months house arrest and 5 years probation. He was also ordered to pay \$15,000 in restitution and perform 200 hours of community service.

Attorneys from the Environmental Crimes Section of the US Dept. of Justice, accepted a one count plea by Puregro to the federal pesticide violation; thereafter, on September 16, 1991 Puregro was sentenced to two years probation and a \$15,000 fine.

PUREGRO CORPORATION - In September 1990 Puregro and four of its employees were charged in US District Court in Spokane for several violations of federal hazardous waste laws; including, knowing endangerment, illegal treatment, storage and disposal, and conspiracy to violate the hazardous waste laws. They were also charged with a violation to the federal pesticide laws. These charges stemmed from an incident in 1987 wherein Puregro and its employees are alleged to have disposed of a mixed batch of hazardous waste pesticides by spraying the mixture onto a field in Pasco, Washington. Several residents near the field became ill and filed complaints with the Washington Department of Social and Health Services. After lengthy plea negotiations, attorneys from the Environmental Crimes Section of the US Dept. of Justice, Wash. D.C. accepted a one count plea by Puregro to the federal pesticide violation; thereafter, on September 16, 1991 Puregro was sentenced to two years probation and a \$15,000 fine.

DOUGLAS J. NIEMAN - On January 3, 1991, the Grays Harbor County Prosecutor charged Nieman with one count of illegal disposal of hazardous waste without a permit. Nieman, while cleaning up some property, discovered several 55 gallon drums. After attempting to move the drums, they broke open and spilled paint. Nieman then illegally buried all the drums on the property. This case is scheduled for trial.

WEYERHAEUSER CORPORATION – Weyerhaeuser pled guilty on November 16, 1990 to five federal Clean Water Act misdemeanors relating to paint discharges in Shannon Slough at Weyerhaeuser's lumber mill in Aberdeen. Weyerhaeuser agreed to pay a total of \$500,000 in fines and restitution with \$375,000 of this amount going to form a trust fund to be used for cleaning up and eradicating pollution sources along Shannon Slough.

MARGUARDSON ASSOCIATES dba CORLENIUS APARTMENTS – On April 23, 1991, Paul Warren Marguardson, a Seattle attorney, plead guilty to one count of violating the criminal provisions of the Clean Air Act. Marguardson stripped at least 160 square feet of friable asbestos material from boilers and pipes at the Corlenius Apartments without providing notice to EPA, or the Puget Sound Air Pollution Control Agency. On July 31, 1991, Marguardson was sentenced in US District Court to 2 years probation, 100 hours of community service and a \$5,000 fine. This was the first criminal conviction in the EPA Region 10 area for a violation of the NESHEP regulations.

JOHN NELSON dba JOHN'S AAA – In May 1987, John Nelson picked up a load of hazardous waste from a car dealer and collected \$1,755 for the supposed legal disposal at Chem Pro. Nelson provided a waste manifest which showed delivery at Chem Pro; however, the waste was later found abandoned in a ravine near Nelson's residence. Nelson also attempted to fraudulently charge another generator \$3,437 for disposing of used oil which Nelson claimed was hazardous waste. On January 28, 1991, Nelson plead guilty to one count of 1st degree theft and one count of attempted 1st degree theft in King County Superior Court. Nelson was sentenced to 3 months in jail and 240 hours of community service on April 19, 1991. He was ordered to pay restitution to the property owner and to Ecology for cleanup expenses which totaled \$9,000. Nelson was also ordered to refrain from any further handling of hazardous waste.

*Nice was convicted
of dumping
hazardous waste
chemicals used for
the production of
methamphetamine
on a public beach.*

KEVIN NICE - On January 7, 1991, Kevin J. Nice pled guilty in the Gray's Harbor County Superior Court to one count of violating Washington's dangerous waste laws. Nice was the second person convicted of a charge that resulted from dumping methamphetamine processing chemicals on a public beach area in Ocean Shores, Washington. On January 14, 1991, Nice was sentenced to 90 days in jail and 12 months probation. Restitution payment is shared equally with Jeffrey Gordon who was previously convicted in this case.

CASES UNDER INVESTIGATION

The joint EPA-Ecology Criminal Task Force is currently investigating several environmental crimes and criminal charges may be pending. In one case, the Criminal Unit has served several search warrants relating to the discovery of 250 (55-gallon) drums found near Wahkiacus, Washington (Klickitat County). Through their investigation, the Criminal Unit has found that Everett Pipe and Steel Co. of Everett Washington was the Probable generator of the waste. Records seized also showed that Everett Pipe and Steel paid individuals to transport and deposit their waste on property in this rural county.

ENFORCEMENT UNIT TRAINING and OTHER SERVICES

ENFORCEMENT TRAINING: During the 1991 fiscal year the Enforcement Unit completed three modules of a multi-modular training course developed by the Unit. Each module was presented at all four regional offices and at headquarters. Module One was presented in January and February and covered general enforcement topics, including: right-of-entry; appeals; criminal vs civil enforcement; and the environmental hearings boards. The turnout was outstanding as over 150 individuals were able to attend the all day course.

The second module was presented in April. This module covered documentation and evidence issues such as; procedures for taking field notes, photographs, interviews, preinspection preparation, writing inspection reports and recommendations for enforcement, and picking a penalty amount. Module Three, which was presented in May, covered issues related to environmental sampling. Module Three was presented by staff from the Manchester Laboratory and experts from the Environmental Investigations Unit.

The Enforcement Unit also presented an enforcement coordinators training course to over thirty staff who are responsible for the paper chase side of enforcement. The course covered such topics as action routing, the appeals process, enforcement dockets and other procedural topics.

The Enforcement Unit courses will be taught in the future on an as need basis. Copies of the written material for any of the Enforcement Unit training courses are available from the Enforcement Unit.

ENFORCEMENT UNIT SERVICES: In addition to the Enforcement Unit training, the Enforcement Unit is attempting to provide many more services to field staff and the rest of the agency which may assist in the agency's enforcement effort. Some of these services include:

- ☞ Issuing Quarterly and Annual Enforcement Action Reports
- ☞ Sending outstanding penalty reports to field staff
- ☞ Sending administrative order timeline reports to field staff
- ☞ Sending delinquent penalties to a collection agency
- ☞ Providing custom reports from the agency enforcement database regarding specific facilities, penalty amounts or cited RCWs or WACs.
- ☞ Fielding questions regarding the status of a specific enforcement action.
- ☞ Fielding questions on any enforcement related question.

If you wish to have any of the above materials or any other information sent to you, please contact the Enforcement Unit at 459-6854.

This report is produced by the Department of Ecology Enforcement Unit. If you have any questions or comments regarding the content of this report please call the Enforcement Unit at 438-7478 or 459-6818.

APPENDIX A

PRINTOUT OF 1991 FISCAL YEAR ENFORCEMENT ACTIONS

PROGRAM ORGANIZATION		CITY	DOCKET #	ISSUE DATE	AGENCY ACTION**	AMOUNT ASSESSED
AQ	BLAKEMORE JOAN	LOON LAKE	90-E158	7/10/90	N	\$0
AQ	AG CHEMICAL SPECIALTIES	OTHELLO	90-E157	7/10/90	P	\$750
AQ	FLITE LEVEL ZERO INC	OTHELLO	90-E159	7/13/90	P	\$500
AQ	RANCH AVIATION	OTHELLO	90-E160	7/13/90	P	\$500
AQ	LLOYD LOGGING INC	TWISP	90-E161	7/17/90	N	\$0
AQ	POE ASPHALT PAVING INC	CLARKSTON	90-E162	7/30/90	P	\$250
AQ	STEGNER GRAIN AND SEED CO	CLARKSTON	90-E164	8/6/90	N	\$0
AQ	TRAINOR RAPHAEL	LOON LAKE	90-E165	8/6/90	N	\$0
AQ	SWANK ENTERPRISES	VALIER	90-E167	8/6/90	N	\$0
AQ	LLOYD LOGGING INC	TWISP	90-E169	8/7/90	P	\$250
AQ	BOISE CASCADE	KETTLE FALLS	90-E168	8/9/90	N	\$0
AQ	BOISE CASCADE	KETTLE FALLS	90-E170	8/9/90	N	\$0
AQ	BLAKEMORE JOAN	LOON LAKE	90-E166	8/10/90	P	\$1,200
AQ	INTERSTATE CONCRETE AND ASPHALT CO	COEUR D ALENE	90-E171	8/31/90	N	\$0
AQ	CENTRAL WASHINGTON ASPHALT INC	MOSES LAKE	90-E172	8/31/90	N	\$0
AQ	CHEWELAH ASPHALT	CHEWELAH	90-E173	9/5/90	N	\$0
AQ	MARTIN WAINE	CLARKSTON	90-E175	10/1/90	N	\$0
AQ	CURTIS BOB	GARFIELD	90-3177	10/11/90	N	\$0
AQ	CRONK MICHAEL	GARFIELD	90-E178	10/11/90	N	\$0
AQ	HALL CEDRIC	COLFAX	90-E179	10/11/90	N	\$0
AQ	CLARK STEVEN	PALOUSE	90-E181	10/11/90	N	\$0
AQ	GUY BENNETT LUMBER CO	CLARKSTON	90-E180	10/12/90	N	\$0
AQ	CHEWELAH ASPHALT	CHEWELAH	90-E183	11/21/90	P	\$500
AQ	ECHO BAY EXPLORATION INC	REPUBLIC	90-E184	12/26/90	N	\$0
AQ	WILLOW BAY RESORT INC	NINE MILE FALLS	90-E186	12/26/90	P	\$1,000
AQ	COCHRAN GARY	PULLMAN	90-E188	12/28/90	N	\$0
AQ	VAAGEN ASPHALT AND PAVING	COLVILLE	90-E185	1/2/91	N	\$0
AQ	BRANDT CHARLES	COLVILLE	91-E103	2/11/91	N	\$0
AQ	BOISE CASCADE	KETTLE FALLS	91-E102	2/13/91	N	\$0
AQ	LESTER BOB	ELLENSBURG	91-C128	2/15/91	N	\$0
AQ	PARKER PHILLIPS ORCHARD	TONASKET	91-C129	2/15/91	P	\$200
AQ	ESTELLE ENTEPRISES	COLVILLE	91-E104	3/11/91	P	\$1,000
AQ	BOISE CASCADE CORP	KETTLE FALLS	91-E101	3/12/91	O	\$0
AQ	BOISE CASCADE CORP	KETTLE FALLS	91-E105	3/12/91	P	\$4,750
AQ	MILLS JIM	DAYTON	91-E106	3/22/91	N	\$0
AQ	WA STATE UNIVERSITY	PULLMAN	91-E107	4/15/91	N	\$0
AQ	WI FOREST PRODUCTS	PESHASTIN	91-C171	5/2/91	N	\$0
AQ	LYSAKER JOHN	CASHMERE	91-C172	5/2/91	N	\$0
AQ	SEUBERT EXCAVATORS INC	COTTONWOOD	91-E110	5/10/91	N	\$0
AQ	TOUCHET VALLEY GOLF COURSE	DAYTON	91-E111	5/14/91	N	\$0
AQ	BOISE CASCADE CORP	KETTLE FALLS	91-E112	6/7/91	O	\$0
AQ	BASIN ASPHALT	YAKIMA	91-C238	6/25/91	N	\$0
CP	WEYERHAEUSER CO	COSMOPOLIS	90-I036	7/2/90	P	\$10,000
CP	VANCOUVER EXTRUSION CO INC	VANCOUVER	90-I038	7/17/90	O	\$0
CP	VANCOUVER EXTRUSION CO INC	VANCOUVER	90-I039	7/17/90	O	\$0
CP	VANCOUVER EXTRUSION CO INC	VANCOUVER	90-I037	7/1790	P	\$43,000
CP	NORTHWEST ALLOYS INC	ADDY	90-I042	7/30/90	N	\$0
CP	REYNOLDS METALS CO	LONGVIEW	90-I040	7/30/90	P	\$3,000
CP	COLUMBIA ALUMINUM CORP	GOLDENDALE	90-I043	8/2/90	NO	\$0
CP	SCOTT PAPER CO	EVERETT	90-I044	8/8/90	P	\$1,200
CP	JAMES RIVER CORP	CAMAS	90-I045	8/10/90	P	\$1,000
CP	JAMES RIVER CORP	CAMAS	90-I046	8/17/90	P	\$25,000
CP	PORT TOWNSEND PAPER CORP	PORT TOWNSEND	90-I047	8/17/90	P	\$5,000
CP	SIMPSON TACOMA KRAFTA CO	TACOMA	90-I048	9/12/90	P	\$400
CP	ALUMINUM CO OF AMERICA	VANCOUVER	90-I053	9/21/90	O	\$0
CP	PORT TOWNSEND PAPER CORP	PORT TOWNSEND	90-I052	9/25/90	P	\$3,000
CP	DAISHOWA AMERICA	PORT ANGELES	90-I051	9/28/90	P	\$2,000
CP	ALUMINUM CO OF AMERICA	VANCOUVER	90-I041	10/1/90	O	\$0
CP	COLUMBIA ALUMINUM CORP	GOLDENDALE	90-I050	10/4/90	O	\$0
CP	COLUMBIA ALUMINUM CORP	GOLDENDALE	90-I049	10/4/90	P	\$7,500
CP	SOUND REFINING CO	TACOMA	90-I055	10/4/90	P	\$4,500
CP	ARCO PETROLELUM PRODUCTS CO	FERNDALE	90-I056	10/4/90	P	\$2,000
CP	ITT RAYONIER INC	PORT ANGELES	90-I059	10/22/90	P	\$3,000
CP	SCOTT PAPER CO	EVERETT	90-I061	10/23/90	P	\$10,000
CP	DAISHOWA AMERICA	PORT ANGELES	90-I060	10/30/90	P	\$500
CP	WEYERHAEUSER CO	LONGVIEW	90-I062	10/30/90	P	\$12,750

PROGRAM ORGANIZATION	CITY	DOCKET #	ISSUE DATE	AGENCY ACTION**	AMOUNT ASSESSED
CP SIMPSON TACOMA KRAFT CO	TACOMA	90-I066	11/7/90	P	\$1,000
CP REYNOLDS METALS CO	LONGVIEW	90-I068	11/7/90	P	\$500
CP OLYMPIC TUG AND BARGE CO INC	SEATTLE	90-222	11/10/90	P	\$10,000
CP PARISH GAIL	OLYMPIA	90-S238	11/13/90	P	\$17,000
CP SIMPSON TACOMA KRAFT CO	TACOMA	90-I067	11/13/90	P	\$10,000
CP LONGVIEW FIBRE CO	LONGVIEW	90-I071	11/20/90	P	\$250
CP PORT TOWNSEND PAPER CORP	PORT TOWNSEND	90-I072	11/28/90	P	\$2,000
CP INTALCO ALUMINUM CORP	FERNDAL	90-I073	11/28/90	P	\$5,000
CP PORT TOWNSEND PAPER CORP	PORT TOWNSEND	90-I074	11/28/90	P	\$2,000
CP COLUMBIA ALUMINUM CORP	GOLDENDALE	90-I064	11/30/90	O	\$0
CP MANGINI DINO	OLYMPIA	90-S307	11/30/90	P	\$4,500
CP COLUMBIA ALUMINUM CORP	GOLDENDALE	90-I063	11/30/90	P	\$10,000
CP REYNOLDS METALS CO	LONGVIEW	90-I069	11/30/90	P	\$55,200
CP LONGVIEW FIBRE CO	LONGVIEW	90-I070	11/30/90	P	\$25,000
CP PORT TOWNSEND PAPER CORP	PORT TOWNSEND	90-I078	12/10/90	P	\$1,000
CP INTALCO ALUMINUM CORP	FERNDAL	90-I079	12/10/90	P	\$4,000
CP SOUND REFINING CO	TACOMA	90-I080	12/12/90	P	\$3,000
CP BOISE CASCADE	WALLULA	90-I081	12/13/90	P	\$1,000
CP JAMES RIVER CORP	CAMAS	90-I082	12/13/90	P	\$5,000
CP PORT TOWNSEND PAPER CORP	PORT TOWNSEND	90-I083	12/13/90	P	\$4,000
CP LONGVIEW FIBRE CO	LONGVIEW	90-I076	12/19/90	N	\$0
CP LONGVIEW FIBRE CO	LONGVIEW	90-I075	12/19/90	P	\$39,900
CP TEXACO REFINING AND MARKETING INC	ANACORTES	90-I086	12/19/90	P	\$1,800
CP SIMPSON TACOMA KRAFT CO	TACOMA	90-I085	12/21/90	O	\$0
CP OCEAN STAR SEAFOODS	BELLINGHAM	90-S296	12/21/90	P	\$2,000
CP REYNOLDS METALS CO	LONGVIEW	91-I003	1/28/91	P	\$18,000
CP PORT TOWNSEND PAPER CORP	PORT TOWNSEND	91-I008	1/28/91	P	\$3,000
CP US OIL AND REFINING CO	TACOMA	91-I007	1/30/91	O	\$0
CP KAISER ALUMINUM AND CHEMICAL CORP	MEAD	91-I010	2/1/91	P	\$2,000
CP ITT RAYONIER INC	PORT ANGELES	91-I005	2/5/91	P	\$20,000
CP ARCO PETROLEUM PRODUCTS CO	FERNDAL	91-I012	2/11/91	P	\$10,500
CP BP OIL CO	FERNDAL	91-I013	2/11/91	P	\$14,000
CP TEXACO REFINING AND MARKETING INC	ANACORTES	91-I014	2/11/91	P	\$5,500
CP WEYERHAEUSER CO	EVERETT	91-I015	2/12/91	O	\$0
CP ALUMINUM CO OF AMERICA	WENATCHEE	91-I018	2/19/91	P	\$9,000
CP INTALCO ALUMINUM CORP	FERNDAL	91-I019	2/21/91	P	\$3,000
CP US OIL AND REFINING CO	TACOMA	91-I021	3/20/91	O	\$0
CP US OIL AND REFINING CO	TACOMA	91-I020	3/20/91	P	\$65,000
CP WEYERHAEUSER CO	LONGVIEW	91-I022	3/20/91	P	\$2,000
CP LONGVIEW FIBRE CO	LONGVIEW	91-I025	3/28/91	O	\$0
CP LONGVIEW FIBRE CO	LONGVIEW	91-I024	3/28/91	P	\$8,100
CP JAMES RIVER CORP	CAMAS	91-I027	3/28/91	P	\$1,000
CP JAMES RIVER CORP	CAMAS	91-I028	4/2/91	P	\$10,000
CP INTEROX AMERICA	LONGVIEW	91-I038	4/2/91	P	\$1,000
CP LONGVIEW FIBRE CO	LONGVIEW	91-I026	4/3/91	P	\$40,000
CP ALUMINUM CO OF AMERICA	WENATCHEE	91-I031	4/4/91	O	\$0
CP COLUMBIA ALUMINUM CORP	GOLDENDALE	91-I032	4/4/91	O	\$0
CP INTALCO ALUMINUM CORP	FERNDAL	91-I033	4/4/91	O	\$0
CP KAISER ALUMINUM AND CHEMICAL CO	MEAD	91-I034	4/4/91	O	\$0
CP KAISER ALUMINUM AND CHEMICAL CO	TACOMA	91-I035	4/4/91	O	\$0
CP VANALCO INC	VANCOUVER	91-I036	4/4/91	O	\$0
CP REYNOLDS METALS CO	LONGVIEW	91-I037	4/4/91	O	\$0
CP ALUMINUM CO OF AMERICA	VANCOUVER	91-I039	4/10/91	P	\$1,000
CP REYNOLDS METALS CO	LONGVIEW	91-I041	4/30/91	N	\$0
CP REYNOLDS METALS CO	LONGVIEW	91-I040	4/30/91	P	\$19,000
CP WEYERHAEUSER CO	COSMOPOLIS	91-I043	4/30/91	P	\$20,000
CP ITT RAYONIER INC	HOQUIAM	91-I044	4/30/91	P	\$20,000
CP ITT RAYONIER INC	HOQUIAM	91-I045	4/30/91	P	\$80,000
CP WEYERHAEUSER CO	COSMOPOLIS	91-I049	5/6/91	P	\$10,000
CP COLUMBIA ALUMINUM CORP	GOLDENDALE	91-I029	5/15/91	P	\$17,200
CP TEXACO REFINERY AND MARKETING INC	ANACORTES	90-N141	5/31/91	N	\$0
CP TEXACO REFINING AND MARKETING INC	ANACORTES	90-N142	5/31/91	P	\$2,000
CP KAISER ALUMINUM AND CHEMICAL CORP	TACOMA	91-I054	6/6/91	P	\$500
CP CRONAUER PAUL	PORT ANGELES	91-S184	6/10/91	P	\$1,000
CP GEORGIA PACIFIC CORP	BELLINGHAM	91-I057	6/11/91	P	\$800
CP WEYERHAEUSER PAPER CO	COSMOPOLIS	91-I056	6/14/91	P	\$400

PROGRAM ORGANIZATION		CITY	DOCKET #	ISSUE DATE	AGENCY ACTION**	AMOUNT ASSESSED
SH	CHOPP RANDY	GIG HARBOR	90-172	8/20/90	O	\$0
SH	PIPER JAMES	POULSBO	90-176	9/6/90	PO	\$2,000
SH	CHELAN BOAT RENTALS	CHELAN	90-178	9/12/90	PO	\$15,000
SH	BLAKELY ISLAND MARINA		90-175	10/2/90	PO	\$2,000
SH	MASON CO DEPT PUB WORKS	SHELTON	87-304	10/19/90	PO	\$30,000
SH	SPENCER JOHN	SHELTON	88-133A	10/19/90	PO	\$30,000
SH	WILMUS STEPHEN	SHELTON	88-134A	10/19/90	PO	\$30,000
SH	JOHNSON ARTHUR	SHELTON	88-135A	10/19/90	PO	\$30,000
SH	VALLEY GEORGE	SHELTON	88-136A	10/19/90	PO	\$30,000
SH	SKOKOMISH FARMS INC	MERCER ISLAND	88-137A	10/19/90	PO	\$30,000
SH	JOHNSON ARVID	SHELTON	88-138A	10/19/90	PO	\$30,000
SH	WATERMAN MARY LOU	HILLSBORO	88-140A	10/19/90	PO	\$30,000
SH	REID LARRY	ALOHA	88-140B	10/19/90	PO	\$30,000
SH	KEALY RAY	SHELTON	88-259A	10/19/90	PO	\$30,000
SH	RICHERT GERALD	SHELTON	90-209	10/19/90	PO	\$30,000
SH	JONES QUARRY	TUMWATER	90-223	11/2/90	PO	\$1,000
SH	DREWRY VIRGIL	OLYMPIA	90-224	11/19/90-	PO	\$7,000
SH	VOTAVA WILLIAM	SPOKANE	91-144	3/4/91	O	\$0
SH	MOORE GREG	CATHLAMET	91-145	4/1/91	PO	\$1,000
SH	WHITE TOM	ANDERSON ISLAND	91-147	4/17/91	O	
SH	HECKARD KEN	LONG BEACH	91-148	4/18/91	PO	\$1,000
SH	WORMAN ROBERT	MONTESANO	90-174A	5/23/91	PO	\$14,880
SH	WIATT JERRY	OLYMPIA	91-150	6/11/91	PO	\$5,000
SH	PIPER JAMES	POULSBO	91-149	6/17/91	PO	\$2,000
SHW	MONARCH BULLET CO	ROCHESTER	90-S265	10/9/90	O	\$0
SHW	MONARCH BULLET CO	ROCHESTER	90-S266	10/9/90	P	\$20,000
SHW	MPS INC	TACOMA	90-S244	10/11/90	O	\$0
SHW	MPS INC	TACOMA	90-S245	10/11/90	P	\$6,000
SHW	STEMILT GROWERS INC	WENATCHEE	90-C239	10/12/90	O	\$0
SHW	BOERSMA BRAD	OTHELLO	90-E717	10/12/90	O	\$0
SHW	BOERSMA BRAD	OTHELLO	90-E718	10/12/90	P	\$3,000
SHW	SCHWERIN CONCAVES INC	WALLA WALLA	90-E719	10/15/90	O	\$0
SHW	COLMAC INDUSTRIES	COLVILLE	90-E720	10/22/90	O	\$0
SHW	COLMAC INDUSTRIES	COLVILLE	90-3721	10/22/90	P	\$6,000
SHW	PILGRIM CANOPY CO	SPOKANE	90-3722	11/6/90	O	\$0
SHW	PILGRIM CANOPY CO	SPOKANE	90-E723	11/6/90	P	\$1,000
SHW	PARISH GAIL	OLYMPIA	90-S237	11/13/90	O	\$0
SHW	LILYBLAD PETROLEUM INC	TACOMA	90-S225	11/14/90	O	\$0
SHW	SOL PRO INC	TACOMA	90-S242	11/14/90	O	\$0
SHW	LILYBLAD PETROLEUM INC	TACOMA	90-S226	11/14/90	P	\$903,000
SHW	SOL PRO INC	TACOMA	90-S243	11/14/90	P	\$57,500
SHW	WESTERN FAB AND FINISHING	WALLA WALLA	90-E726	12/4/90	O	\$0
SHW	WESTERN FAB AND FINISHING	WALLA WALLA	90-E725	12/4/90	P	\$15,000
SHW	PACEMAKER INDUSTRIES INC	SPOKANE	90-3727	12/7/90	O	\$0
SHW	VALLEY REFINISHING	SUMNER	90-S214	12/18/90	O	\$0
SHW	VALLEY REFINISHING	SUMNER	90-S215	12/18/90	P	\$25,000
SHW	CHEMICAL PROCESSORS INC	SEATTLE	90-N242	1/9/91	CO	\$0
SHW	CHEMICAL PROCESSORS INC	SEATTLE	90-N243	1/9/91	CO	\$0
SHW	STEMILT GROWERS INC	WENATCHEE	90-C252	3/1/91	P	\$12,000
SHW	WA STATE DEPT CORRECTIONS	WALLA WALLA	90-E729	3/21/91	O	\$0
SHW	US BUREAU OF RECLAMATION	GRAND COULEE	90-E728	4/2/91	O	\$0
SHW	COMET TRAILER MFG CORP	SELAH	90-C280	4/17/91	O	\$0
SHW	COMET TRAILER MFG CORP	SELAH	90-C281	4/17/91	P	\$94,000
SHW	ROSS ELECTRIC	CHEHALIS	91-S142	5/8/91	O	\$0
SHW	ROSS ELECTRIC	CHEHALIS	91-S143	5/8/91	P	\$90,000
SHW	CHEMICAL PROCESSORS INC	SEATTLE	91-154	6/7/91	O	\$0
TC	VANCOUVER PORT OF	VANCOUVER	90-S189	7/15/90	O	\$0
TC	VANCOUVER OIL CO	VANCOUVER	90-S135	8/10/90	O	\$0
TC	205 GROUP THE	VANCOUVER	90-S138	8/10/90	O	\$0
TC	NORCORE PLASTICS INC	TACOMA	90-S207	8/22/90	O	\$0
TC	LEYENDEKKER ARTHUR	MABTON	90-C195	8/23/90	P	\$3,000
TC	LEYENDEKKER ARTHUR	MABTON	90-C196	8/23/90	O	\$0
TC	GENERAL METALS OF TACOMA INC	TACOMA	90-S260	9/24/90	O	\$0
TC	J M MARTINAC SHIPBUILDING CORP	TACOMA	90-S274	10/11/90	O	\$0
TC	GENERAL METALS OF TACOMA INC	TACOMA	90-S273	10/23/90	O	\$0

PROGRAM ORGANIZATION		CITY	DOCKET #	ISSUE DATE	AGENCY ACTION**	AMOUNT ASSESSED
TC	ITT RAYONIER INC	SHELTON	90-S255	10/31/90	O	\$0
TC	PACIFIC TRANSPORTATION GROUP	TACOMA	90-S313	1/9/91	O	\$0
TC	AMERICAN FIBERGLASS	BELLEVUE	90-S268	1/11/91	O	\$0
TC	JOHNNY MERCER REALTYL INC	OTHELLO	90-E724	2/7/91	O	\$0
TC	BRAZIL ARDEN	OMAK	91-C141	3/22/91	O	\$0
TC	CENEX LTD	TIGARD	91-S119	4/11/91	O	\$0
TC	GRANGE SUPPLY	CHEHALIS	91-S120	4/11/91	O	\$0
TC	CENEX LTD	ST PAUL	91-S121	4/11/91	O	\$0
TC	VINEYARD FRANK	VANCOUVER	91-S123	4/11/91	O	\$0
TC	WA STATE DEPT OF CORRECTIONS	OLYMPIA	91-S147	5/6/91	O	\$0
TC	MYERS JOHN	TACOMA	91-S160	5/20/91	O	\$0
WQ	NACHES HEIGHTS ENTERPRISES INC	TIETON	90-C202	7/3/90	I	\$0
WQ	BERGHOFF ORCHARDS	YAKIMA	90-C203	7/3/90	I	\$0
WQ	SMITH AND ARDUSSI CO	SEATTLE	90-N194	7/6/90	NO	\$0
WQ	GRANT COUNTY OF	EPHRATA	90-E714	7/6/90	O	\$0
WQ	WINEGAR DAIRY	ELLENSBURG	90-C205	7/10/90	O	\$0
WQ	CORMAR LTD	TACOMA	90-N195	7/12/90	N	\$0
WQ	CORMAR LTD	TACOMA	90-N196	7/12/90	P	\$750
WQ	LEAVENWORTH FRUIT CO	LEAVENWORTH	90-C208	7/13/90	NO	\$0
WQ	ROBISON CONST INC	KENT	90-N198	7/16/90	P	\$500
WQ	SMITH BROTHERS FARMS INC	KENT	90-N180	7/23/90	P	\$1,000
WQ	BARKER TREE FARM	KELSO	90-S218	8/17/90	O	\$0
WQ	YAKIMA VALLEY CHEESE	SUNNYSIDE	90-C223	8/20/90	I	\$0
WQ	MOUNTAIN KRISP CO	TIETON	90-C224	8/20/90	I	\$0
WQ	LIQUID SUGARS INC	OAKLAND	90-C225	8/20/90	I	\$0
WQ	TRY AGAIN MINING CLAIM	TONASKET	90-C226	8/20/90	I	\$0
WQ	APPLEWAY STORAGE AND PACKING CO	OROVILLE	90-C227	8/20/90	I	\$0
WQ	OMI CORP	SEATTLE	89-N280	8/20/90	N	\$0
WQ	OMI CORP	SEATTLE	89-N281	8/20/90	P	\$3,000
WQ	WILLIAM DIMOND CO	PORTLAND	90-S206	8/20/90	P	\$15,000
WQ	PERHAM FRUIT CORP	YAKIMA	90-C229	8/21/90	N	\$0
WQ	PERHAM FRUIT CORP	YAKIMA	90-C228	8/21/90	P	\$1,000
WQ	EDALEEN DAIRY	LYNDEN	90-N208	8/22/90	N	\$0
WQ	IMPERIAL WEST CHEMICAL CO	SPOKANE	90-E346	8/28/90	O	\$0
WQ	NELBRO PACKING CO	ANACORTES	90-N214	8/31/90	N	\$0
WQ	STEMILT GROWERS INC	WENATCHEE	90-C231	9/6/90	N	\$0
WQ	GOULD RICHARD	SPOKANE	90-E353	9/11/90	NO	\$0
WQ	SANFORD MIKE	NEWPORT	90-E357	9/13/90	O	\$0
WQ	DALS TRUCK WASH	OROVILLE	90-C233	9/17/90	I	\$0
WQ	MCBROS FRUIT CO	YAKIMA	90-C234	9/17/90	I	\$0
WQ	NORDEVIN INC	PUYALLUP	90-S223	9/17/90	O	\$0
WQ	NORDEVIN INC	PUYALLUP	90-S224	9/17/90	P	\$20,000
WQ	A AND B HOP FARMS	PROSSER	90-C243	9/19/90	N	\$0
WQ	TACOMA CITY OF	TACOMA	90-S247	9/25/90	O	\$0
WQ	TACOMA PORT OF	TACOMA	90-S259	10/5/90	O	\$0
WQ	CHEROKEE BAY COMMUNITY CLUB	MAPLE VALLEY	90-180	10/11/90	N	\$0
WQ	ALLIED AQUATICS	OLYMPIA	90-181	10/15/90	N	\$0
WQ	ALLIED AQUATICS	OLYMPIA	90-171	10/23/90	N	\$0
WQ	ALLIED AQUATICS	OLYMPIA	90-184	10/23/90	N	\$0
WQ	AQUATICS UNLIMITED	KENT	90-191	10/24/90	N	\$0
WQ	AQUATICS UNLIMITED	KENT	90-208	10/24/90	N	\$0
WQ	AQUATICS UNLIMITED	KENT	90-207	10/26/90	N	\$0
WQ	AUTO CENTER OF SILVERDALE	SILVERDALE	90-N226	10/29/90	N	\$0
WQ	AUTO CENTER OF SILVERDALE	SILVERDALE	90-N227	10/29/90	P	\$1,000
WQ	ALLIED AQUATICS	OLYMPIA	90-185	11/1/90	N	\$0
WQ	ALLIED AQUATICS	OLYMPIA	90-186	11/1/90	N	\$0
WQ	ALLIED AQUATICS	OLYMPIA	90-188	11/1/90	N	\$0
WQ	ALLIED AQUATICS	OLYMPIA	90-189	11/1/90	N	\$0
WQ	MIKES AIRWAYS SHELL	SILVERDALE	90-N229	11/13/90	N	\$0
WQ	MIKES AIRWAYS SHELL	SILVERDALE	90-N230	11/13/90	P	\$1,000
WQ	SMITH AND ARDUSSI CO	SEATTLE	90-N231	11/21/90	P	\$10,000
WQ	DOMAN LARRY	YAKIMA	90-C284	12/5/90	N	\$0
WQ	SNOKIST TERRACE HEIGHTS CO	YAKIMA	90-C285	12/5/90	N	\$0
WQ	SHATTUCK MIKE	OLYMPIA	90-S301	12/19/90	O	\$0
WQ	MEYERS DISTRIBUTING CO	KIRKLAND	90-N235	1/3/91	N	\$0
WQ	SILVERDALE RENTALS	SILVERDALE	90-N237	1/3/91	N	\$0

PROGRAM ORGANIZATION	CITY	DOCKET #	ISSUE DATE	AGENCY ACTION**	AMOUNT ASSESSED
WQ MEYERS DISTRIBUTING CO	KIRKLAND	90-N236	1/3/91	P	\$1,000
WQ SILVERDALE RENTALS	SILVERDALE	90-N238	1/3/91	P	\$1,000
WQ CHEROKEE BAY COMMUNITY CLUB	MAPLE VALLEY	90-226	1/8/91	PO	\$7,000
WQ LILYBLAD PETROLEUM INC	TACOMA	90-S314	1/9/91	O	\$0
WQ SENECA FOODS CORP	PROSSER	91-E302	1/15/91	NO	\$0
WQ PACIFIC NORTHWEST TERMINALS INC	TACOMA	90-S310	1/15/91	O	\$0
WQ PACIFIC NORTHWEST TERMINALS INC	TACOMA	90-S311	1/15/91	P	\$2,000
WQ ALLIED AQUATICS	OLYMPIA	90-228	1/16/91	PO	\$18,000
WQ ODEGARD DEVELOPMENT CORP	BELLEVUE	91-N107	1/23/91	P	\$500
WQ BIG O DELI CHEVRON	SPANAWAY	90-S312	1/24/91	O	\$0
WQ CHEVRON USA INC	PORTLAND	90-N240	1/25/91	N	\$0
WQ CHEVRON USA INC	PORTLAND	90-N241	1/25/91	P	\$35,000
WQ ADPRO LITHO INC	EVERETT	91-N113	1/29/91	N	\$0
WQ KERR STEAMSHIP CO INC	PORTLAND	91-S114	2/7/91	P	\$5,000
WQ VALLEY FARMS INC	BURLINGTON	91-N104	2/12/91	N	\$0
WQ VALLEY FARMS INC	BURLINGTON	90-N112	2/12/91	P	\$1,000
WQ TACOMA BOATBUILDING CO	TACOMA	90-S280	2/13/91	CO	\$0
WQ JOHN LINDE DAIRY	GRANGER	91-C127	2/14/91	N	\$0
WQ MCCAIN FOODS INC	OTHELLO	91-E308	2/15/91	O	\$0
WQ MCCAIN FOODS INC	OTHELLO	91-E309	2/15/91	P	\$10,000
WQ LES SCHWAB TIRE CENTER INC	PORT ORCHARD	90-N244	2/26/91	N	\$0
WQ HARRIS TOM	OLYMPIA	91-S122	2/26/91	O	\$0
WQ CAMPBELL GROUP THE	GRANITE FALLS	91-N101	3/4/91	N	\$0
WQ SUNSET QUARRIES INC	ISSAQUAH	91-N114	3/4/91	N	\$0
WQ SEATTLE STEEL INC	SEATTLE	91-N120	3/4/91	N	\$0
WQ BOUNDARY FISH CO INC	BLAINE	91-N121	3/4/91	N	\$0
WQ BOUNDARY FISH CO INC	BLAINE	91-N125	3/4/91	P	\$1,000
WQ LILYBLAD PETROLEUM INC	TACOMA	91-S109	3/7/91	P	\$79,000
WQ AAA MONROE ROCK CORP	SNOHOMISH	91-N123	3/8/91	N	\$0
WQ AAA MONROE ROCK CORP	SNOHOMISH	91-N124	3/8/91	P	\$1,500
WQ SUPERIOR ASPHALT AND CONCRETE	YAKIMA	91-C143	3/12/91	N	\$0
WQ GARFIELD CITY OF	GARFIELD	91-E315	3/12/91	O	\$0
WQ PALOUSE CITY OF	PALOUSE	91-E316	3/12/91	O	\$0
WQ MOUNTAIN VIEW DAIRY	OUTLOOK	91-C147	3/13/91	N	\$0
WQ CLYDE BISHOP DAIRY	GRANGER	91-C148	3/13/91	N	\$0
WQ DEVRIES DAIRY	ORTING	91-S130	3/14/91	N	\$0
WQ HILL DAIRY	MOUNT VERNON	91-N126	3/15/91	N	\$0
WQ HILL DAIRY	MOUNT VERNON	91-N127	3/15/91	P	\$750
WQ WEYERHAEUSER CO	SNOQUALMIE	91-N129	3/27/91	N	\$0
WQ JOHNSON KEITH	MOUNT VERNON	91-N132	3/27/91	N	\$0
WQ WA STATE DEPT TRANSPORTATION	SPOKANE	91-E321	3/28/91	O	\$0
WQ SKAGIT CO SEWER DIST NO 1	LACONNER	91-N136	3/29/91	N	\$0
WQ BREDA TRANSPORTATION	ISSAQUAH	91-N141	4/4/91	P	\$500
WQ IONE TOWN OF	IONE	91-E322	4/8/91	O	\$0
WQ ANNAPOLIS WATER DIST	PORT ORCHARD	91-N134	4/9/91	N	\$0
WQ COULEE CITY TOWN OF	COULEE CITY	91-E325	4/9/91	O	\$0
WQ ANNAPOLIS WATER DIST	PORT ORCHARD	91-N135	4/9/91	P	\$2,000
WQ GRANDVIEW HILLTOP DAIRY	SUNNYSIDE	91-C165	4/10/91	O	\$0
WQ WA STATE UNIVERSITY	PULLMAN	91-E329	4/12/91	N	\$0
WQ DRIESEN ART	SUNNYSIDE	91-C168	4/18/91	O	\$0
WQ FERNDALE APARTMENTS	FERNDALE	91-N146	4/25/91	NO	\$0
WQ FERNDALE MOBILE VILLAGE	FERNDALE	91-N147	4/25/91	NO	\$0
WQ LAMPLIGHTER MOBILE HOME PARK	FERNDALE	91-N148	4/25/91	NO	\$0
WQ MCCONKIE PAUL	MOSES LAKE	91-E331	4/29/91	N	\$0
WQ RIGHT ANGLE REGISTERED HOLSTIEN	DEER PARK	91-E332	5/1/91	N	\$0
WQ SPACKMAN BRIAN	ELK	91-E335	5/1/91	P	\$2,000
WQ SOUTH BEND CITY OF	SOUTH BEND	91-S152	5/6/91	N	\$0
WQ WOOD DAIRY	ROY	91-S163	5/9/91	N	\$0
WQ SEATTLE STEEL INC	SEATTLE	91-N144	5/10/91	P	\$500
WQ BOISE CASCADE CORP	KETTLE FALLS	91-E336	5/13/91	O	\$0
WQ VOLKER TERRY	COLVILLE	91-E341	5/14/91	N	\$0
WQ DANIELSON FARMS	CAMANO ISLAND	91-N157	5/15/91	N	\$0
WQ DANIELSON FARMS	CAMANO ISLAND	91-N158	5/15/91	P	\$750
WQ SMITH AND ARDUSSI INC	SEATTLE	91-N159	5/21/91	O	\$0
WQ PACIFIC COAST COAL CO	BLACK DIAMOND	91-N154	5/30/91	N	\$0
WQ PACIFIC COAST COAL CO	BLACK DIAMOND	91-N155	5/31/91	P	\$6,000
WQ ALPINE RESOURCES INC	LAKE STEVENS	91-E347	6/6/91	N	\$0
WQ HENDERSON ALAN	SPOKANE	91-E348	6/6/91	O	\$0

PROGRAM ORGANIZATION	CITY	DOCKET #	ISSUE DATE	AGENCY ACTION**	AMOUNT ASSESSED
WQ OCEAN CONSTRUCTION SUPPLIES CO	SEATTLE	91-N172	6/7/91	P	\$2,000
WQ TWIN CITY FOODS	PROSSER	91-C233	6/19/91	N	\$0
WQ WASHINGTON FRONTIER JUICE	PROSSER	91-C325	6/19/91	N	\$0
WQ PROSSER CITY OF	PROSSER	91-C236	6/19/91	N	\$0
WQ HAUG MIKE	BELLINGHAM	91-N168	6/21/91	N	\$0
WQ WENATCHEE CITY OF	WENATCHEE	91-C234	6/25/91	O	\$0
WR WESTWIND RANCH	WILSON CREEK	90-E572	7/3/90	P	\$100
WR AXELSEN DRILLING	BOTHELL	90-N200	7/11/90	P	\$6,300
WR NELSON WELL DRILLING	PASCO	90-E574	8/21/90	O	\$0
WR WATER WELLS DRILLING	YAKIMA	90-C219	8/29/90	P	\$100
WR PEARSON DRILLING INC	EDMONDS	90-N216	8/30/90	O	\$0
WR MOUNTAIN WELL DRILLING	ELLENSBURG	90-C230	9/7/90	P	\$100
WR COOL GALE	BAINBRIDGE ISLA	90-N219	9/17/90	O	\$0
WR WESTWIND RANCH	WILSON CREEK	90-E610	9/18/90	P	\$200
WR PONDEROSA DRILLING	YAKIMA	90-C240	9/21/90	P	\$100
WR PONDEROSA DRILLING	YAKIMA	90-C241	9/21/90	P	\$300
WR THURLOW BERNARD	TWISP	90-C266	11/14/90	O	\$0
WR REDWINE J B	GRANGER	90-C279	11/29/90	O	\$0
WR PEARSON DRILLING INC	EDMONDS	90-N239	12/27/90	P	\$5,000
WR HITT WELL DRILLING	STANWOOD	91-N108	1/15/91	O	\$0
WR MYRICKS WELL DRILLING	MOSES LAKE	91-E501	1/23/91	P	\$100
WR HOWE DRILLING CO	GRANITE FALLS	91-N111	1/28/91	PO	\$700
WR LARRY BURD WELL DRILLING	PENDLETON	91-E502	2/1/91	P	\$200
WR LARRY BURD WELL DRILLING	PENDLETON	91-E503	2/1/91	P	\$100
WR D AND F DRILLING	MOSES LAKE	91-C123	2/20/91	P	\$100
WR MCNEAL CLEO	COWICHE	91-C124	2/21/91	O	\$0
WR BACH WELL DRILLING	YAKIMA	91-C125	2/21/91	O	\$0
WR BACH WELL DRILLING	YAKIMA	91-C126	2/21/91	O	\$0
WR PASCO SANITARY LANDFILL	PASCO	91-E511	2/25/91	O	\$0
WR SHANNON C R	VISALIA	91-E515	4/2/91	O	\$0
WR WACKER JOHN	PORTLAND	91-E516	4/10/91	O	\$0
WR SHANNON C R	VISALIA	91-E519	4/23/91	O	\$0
WR GRANT CO PUB WORKS	EPHRATA	91-E517	4/24/91	O	\$0
WR MATHEWS WELL DRILLING	BAINBRIDGE ISLA	91-N149	4/24/91	P	\$300
WR ASH ALVIN	TACOMA	91-E518	5/3/91	O	\$0
WR WESTWIND RANCH	WILSON CREEK	91-E520	5/14/91	O	\$0
WR L AND L DRILLING	WILSON CREEK	91-E521	5/14/91	O	\$0
WR D AND F DRILLING	MOSES LAKE	91-E522	5/17/91	O	\$0
WR FOUR STAR DRILLING	HARTLINE	91-E523	6/7/91	O	\$0
WR POOL HENRY	KETTLE FALLS	91-E524	6/14/91	O	\$0
WR FOGLE PUMP SUPPLY	COLVILLE	91-E525	6/14/91	O	\$0
WR RICK POULIN DRILLING	SELAH	91-C267	6/28/91	O	\$0
WR SUNNY DENE RANCH	GRANDVIEW	91-C268	6/28/91	O	\$0

NOTES: * AQ = AIR QUALITY
CP = CENTRAL PROGRAMS
SH = SHORELANDS
SHW = SOLID & HAZARDOUS WATE
TC = TOXICS CLEAN-UP
WR = WATER RESOURCES
WQ = WATER QUALITY

** N = NOTICE OF PENALTY
O = ORDER
P = PENALTY
CO = CONSENT ORDER
I = NOTICE OF INTENT